



CITY OF
PORTLAND, OREGON
OFFICE OF THE CITY ATTORNEY

Robert L. Taylor, Interim City Attorney
1221 SW 4th Avenue, Suite 430
Portland, Oregon 97204
Telephone: (503) 823-4047
Fax: (503) 823-3089

February 9, 2021

Honorable Michael H. Simon
Mark O. Hatfield United States Courthouse
Room 1527
1000 Southwest Third Avenue
Portland, Oregon 97204-2944

Re: United States of America v. City of Portland, Case No. 3:12-cv-02265-SI
Court Order Regarding 2021 Scheduling and Requesting Comments

Dear Judge Simon:

This supplemental letter from the City requests the Court decline the U.S. Department of Justice proposal that the Court hold a virtual status conference on February 25, 2021 (ECF 231), as the City will have insufficient time to respond to the Department of Justice annual report.

The Department of Justice originally agreed to provide the annual report thirty days in advance of the status conference, which was January 25, 2021; this date would have given the City sufficient time to file a responsive report before the status conference. While the Department of Justice updated its timeline for filing the report to February in its filing to the Court, they still have not provided it and have not told the City when they intend to do so. With just over two weeks before the originally scheduled status conference, the City does not have adequate time to respond to the Department of Justice's report by the date currently scheduled for the status conference.

If the Court is inclined to hold a virtual status conference sooner than June 2021, the City requests the date be rescheduled to provide the City adequate time to submit its responsive report.

Thank you for your consideration.

Sincerely,

/s/ Heidi K. Brown

Heidi K. Brown
Chief Deputy City Attorney

HKB/klk